



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

PO Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300

April 17, 2012

City of Battle Ground
ATTN: Mr. Mark Herceg
109 SW 1st Street
Battle Ground, WA 98604

RE: Water Quality Certification Order No. **9026** for Corps Public Notice No. **NWS-2011-165**, to fill wetlands for the SE Grace Avenue Improvement Project, Clark County, Washington

Dear Mr. Herceg:

On February 7, 2011, The City of Battle Ground submitted a Joint Aquatic Resource Permit Application (JARPA) to the Department of Ecology (Ecology) for a Section 401 Water Quality Certification (401 Certification) under the federal Clean Water Act to construct the SE Grace Avenue Improvement project within the City of Battle Ground, Clark County, Washington. A joint public notice regarding the request was distributed by the U.S. Army Corps of Engineers for the above-referenced project pursuant to the provisions Chapter 173-225 WAC on April 19, 2011, with an Erratum issued on April 29, 2011.

The project will permanently fill a total of 1.02 acres of Category III and IV wetlands. Mitigation to compensate for the proposed unavoidable wetland impacts will occur off site through the purchase of 2.55 acres of the Remy Consolidated Wetland Mitigation Site located at 20521 NE 112th Avenue, within the city of Battle Ground. The City of Battle Ground is responsible for ensuring the success, sustainability, and monitoring of their portion of the consolidated wetland mitigation site.

On behalf of the State of Washington, Ecology certifies that the work described in the original JARPA and the public notice complies with applicable provisions of Sections 301, 302, 303, 306 and 307 of the Clean Water Act, as amended and applicable state laws. This certification is subject to the conditions contained in the enclosed Order.

If you have any questions, please contact Lori Ochoa at (360) 407-6926. The enclosed Order may be appealed by following the procedures described in the Order.

Sincerely,

A handwritten signature in cursive script, reading "Perry J Lund" followed by a small "for" and a flourish.

Perry J Lund, Unit Manager
Shorelands and Environmental Assistance Program
Southwest Regional Office

Enclosure

By Certified Mail 7009 3410 0000 1272 8576



cc: Sandra Manning, US Army Corps of Engineers
Brent Davis, Clark County
Robert Maul, City of Battle Ground
Steve Sego, Battle Ground Mitigation Partners

e-cc: ECY RE FEDPERMITS
Loree Randall – Ecology HQ, SEA
Lori Ochoa – Ecology SWRO, SEA
Brad Murphy – Ecology HQ, SEA
Rebecca Schroeder – Ecology SWRO, SEA
Deborah Cornett - Ecology SWRO, WQ

**IN THE MATTER OF GRANTING A
WATER QUALITY
CERTIFICATION TO
The City of Battle Ground
ATTN: Mr. Mark Herceg**
in accordance with 33 U.S.C. 1341
(FWPCA § 401), RCW 90.48.120, RCW
90.48.260 and Chapter 173-201A WAC

) **ORDER # 9026**

) **Corps Reference No. NWS-2011-165**

) To construct the SE Grace Avenue Improvement
) Project; Wetlands, Clark County, Washington

TO: City of Battle Ground
ATTN: Mr. Mark Herceg
109 SW 1st Street
Battle Ground, WA 98604

On February 7, 2011, The City of Battle Ground submitted a Joint Aquatic Resource Permit Application (JARPA) to the Department of Ecology (Ecology) requesting a Section 401 Water Quality Certification. A joint public notice regarding the request was distributed by the U.S. Army Corps of Engineers (Corps) for the above-referenced project pursuant to the provisions Chapter 173-225 WAC on April 19, 2011, with an Erratum issued on April 29, 2011.

The project area will encompass approximately 1.01 miles of SE Grace Avenue from the intersection with SE Eaton Road (NE 199th Street) north to E Main Street within the City of Battle Ground, Clark County, Washington; Section 2, Township 3 North, Range 2 East; WRIA 28, Salmon-Washougal Watershed.

The proposed improvements will bring the road to a two-lane Minor Arterial standard as identified in the 2005-2025 Battle Ground City Transportation System Plan. The work will entail two 11-foot travel lanes, a 12-foot center left turn lane, a five-foot bicycle lane, street lighting, landscaping, and detached five-foot sidewalks. The right-of-way requires a minimum 60-foot width. The purpose of the project is to provide the community with safe and efficient transportation infrastructure by improving safety and capacity deficiencies along this portion of Grace Avenue. The project will be constructed in two phases.

The project will permanently fill a total of 1.02 acres of Category III and IV wetlands. Mitigation to compensate for the proposed unavoidable wetland impacts will occur off site through the purchase of 2.55 acres of the Remy Consolidated Wetland Mitigation Site located at 20521 NE 112th Avenue, within the city of Battle Ground.

AUTHORITIES:

In exercising authority under 33 U.S.C. § 1341, RCW 90.48.120, and RCW 90.48.260, Ecology has examined this application pursuant to the following:

1. Conformance with applicable water-quality-based, technology-based, and toxic or pretreatment effluent limitations as provided under 33 U.S.C. §1311, 1312, 1313, 1316, and 1317 (FWPCA § 301, 302, 303, 306 and 307);

2. Conformance with the state water quality standards contained in Chapter 173-201A WAC and authorized by 33 U.S.C. §1313 and by Chapter 90.48 RCW, and with other applicable state laws; and,
3. Conformance with the provision of using all known, available, and reasonable methods to prevent and control pollution of state waters as required by RCW 90.48.010.

WATER QUALITY CERTIFICATION CONDITIONS:

Through issuance of this Order, Ecology certifies that it has reasonable assurance that the activity as proposed and conditioned will be conducted in a manner that will not violate applicable water quality standards and other appropriate requirements of state law. In view of the foregoing and in accordance with 33 U.S.C. §1341, RCW 90.48.120, RCW 90.48.260 Chapter 173-200 WAC and Chapter 173-201A WAC, water quality certification is granted to the Applicant subject to the conditions within this Order.

Certification of this proposal does not authorize the Applicant to exceed applicable state water quality standards (Chapter 173-201A WAC), ground water standards (Chapter 173-200 WAC) or sediment quality standards (Chapter 173-204 WAC). Furthermore, nothing in this certification shall absolve the Applicant from liability for contamination and any subsequent cleanup of surface waters, ground waters, or sediments occurring as a result of project construction or operations.

A. General Conditions:

1. For purposes of this Order, the term "Applicant" shall mean the City of Battle Ground and its agents, assignees, and contractors.
2. For purposes of this Order, all submittals required by its conditions shall be sent to Ecology's Southwest Regional Office, Attn: Federal Permit Manager, SEA Program, P.O. Box 47775, Olympia, WA 98504-7775, or loch461@ecy.wa.gov. Any submittals shall reference Order No. **9026** and Corps No. **NWS-2011-165**.
3. Work authorized by this Order is limited to the work described in the JARPA, the *SE Grace Avenue Improvement Project Wetland and Habitat Mitigation Plan* and associated appendices received by Ecology on February 7, 2011, and as revised per the *Addendum to the Wetland and Habitat Mitigation Plan* received on March 6, 2012. The Applicant will be out of compliance with this Order and must reapply with an updated application if the information contained in the JARPA is voided by subsequent changes to the project not authorized by this Order.
4. Within 30 days of receipt of an updated JARPA, Ecology will determine whether the revised project requires a new water quality certification and public notice or whether a modification to this Order is required.
5. This Order shall be rescinded if the U.S. Army Corps of Engineers does not issue a Section 404 permit.

6. Copies of this Order shall be kept on the job site and readily available for reference by Ecology personnel, the construction superintendent, construction managers and lead workers, and state and local government inspectors.
7. The Applicant shall provide access to the project site and all mitigation sites upon request by Ecology personnel for site inspections, monitoring, necessary data collection, and/or to ensure that conditions of this Order are being met.
8. Nothing in this Order waives Ecology's authority to issue additional orders if Ecology determines that further actions are necessary to implement the water quality laws of the state. Further, Ecology retains continuing jurisdiction to make modifications hereto through supplemental order, if additional impacts due to project construction or operation are identified (e.g., violations of water quality standards, downstream erosion, etc.), or if additional conditions are necessary to further protect water quality.
9. The Applicant shall ensure that all appropriate project engineers and contractors at the project site have read and understand relevant conditions of this Order and all permits, approvals, and documents referenced in this Order. The Applicant shall provide Ecology a signed statement (see Attachment A for an example) from each project engineer and contractor that they have read and understand the conditions of this Order and the above-referenced permits, plans, documents, and approvals. These statements shall be provided to Ecology before construction begins at the project.
10. This Order does not authorize direct, indirect, permanent, or temporary impacts to waters of the state or related aquatic resources, except as specifically provided for in conditions of this Order.
11. Failure to comply with this Order may result in the issuance of civil penalties or other actions, whether administrative or judicial, to enforce the terms of this Order.

B. Timing:

1. This Order is valid until all of the compliance requirements in this document have been met.

C. Notification Requirements:

1. The Applicant shall provide written notification (FAX, e-mail, or mail) to Ecology's Southwest Regional Office Federal Permit Manager in accordance with condition A.2 above for the following activities:
 - a. At least ten (10) days prior to a pre-construction meeting
 - b. At least ten (10) days prior to the onset of any work on site
 - c. At least ten (10) days prior to the onset of in-water work, including wetlands
 - d. At least ten (10) days prior to the onset of work at the wetland mitigation site
 - e. Immediately following a violation of the state water quality standards or any condition of this Order
 - f. Within fourteen (14) days after completion of construction.

D. Construction, Equipment Staging and Maintenance:

1. Construction stormwater, sediment, and erosion control best management practices (BMPs; e.g., filter fences, etc.) suitable to prevent exceedances of state water quality standards shall be in place before starting construction at the site.
2. Sediment and erosion control measures shall be inspected and maintained prior to and during project implementation.
3. No petroleum products, fresh concrete, lime or concrete, chemicals, or other toxic or deleterious materials shall be allowed to enter waters of the state.
4. All construction debris shall be properly disposed of in a manner to prevent it from entering wetlands and/or wetland buffers.
5. All work within the project limits shall be clearly marked/staked prior to construction. Clearing limits, travel corridors, and stockpile sites shall be clearly marked. Sensitive areas and buffers that are to be protected from disturbance shall be marked so as to be clearly visible to equipment operators. All project staff shall be trained to recognize construction fencing or flagging that identifies sensitive area boundaries. Equipment shall enter and operate only within the marked clearing limits corridors and stockpile areas.
6. Machinery and equipment used during construction shall be serviced, fueled, and maintained on uplands in a confined area in order to prevent contamination to waters of the state. Fueling areas will be provided with adequate spill containment.
7. Appropriate Best Management Practices (BMPs) shall be implemented to minimize track-out during construction.
8. Staging area will be located a minimum of 50 feet and, where practical, 200 feet from waters of the state (including wetlands), unless authorized by Ecology.
9. Wash water containing oils, grease, or other hazardous materials resulting from wash down of equipment or working area shall be contained for proper disposal, and shall not be discharged into state waters or storm drains.
10. Clean Fill Criteria: The Applicant shall ensure that fill (soil) placed for the proposed project does not contain toxic materials in toxic amounts.

E. Wetland Compensatory Mitigation Conditions:

1. The Applicant shall mitigate wetland impacts through the use of the Remy Consolidated Wetland Mitigation Site as described in the *SE Grace Avenue Improvement Project Wetland and Habitat Mitigation Plan* and associated appendices prepared by Clark County Department of Environmental Services and received by Ecology on February 7, 2011 (hereinafter called the "Mitigation Plan"), and as revised per the *Addendum to the Wetland and Habitat Mitigation Plan* received by Ecology on March 6, 2012 (hereinafter called the "Mitigation Plan Addendum"), or as modified by this Order or revised and approved by Ecology.

2. The Applicant shall submit any further changes to these documents in writing to Ecology (per condition A.2 above) for review and approval before work begins.
3. The Applicant will purchase 2.55 acres at the Remy Consolidated Wetland Mitigation Site (Remy) located at 20521 NE 112th Avenue, Battle Ground, WA. The Remy site is owned by The City of Battle Ground Property, and Battle Ground Mitigation Partners has a contract with the City of Battle Ground to manage the site. Within 60 days of the issuance of this Order, the Applicant shall submit the following to Ecology per Condition A.2 of this Order:
 - a. Documentation that 2.55 acres of the Remy site has been purchased by the Applicant per this Order. This documentation shall include the legal description of the area within the Remy site used for mitigation for the SE Grace Avenue Improvement Project.
 - b. A copy of the recorded notice that will be amended to the property title that identifies the legal portion of the site dedicated to the SE Grace Avenue Improvement Project. Prior to submittal to Ecology, this notice shall be submitted to the Clark County Auditor's office for filing, along with the Order number, the Order issuance date, and the amount of mitigation required by the Order.
4. The Applicant shall complete the purchase of the required 2.55 acres of mitigation before the impacts to wetlands occur, or Ecology may require additional compensation to account for temporal loss.
5. The Applicant is responsible for ensuring the success, sustainability, and monitoring of their portion of the mitigation site.
6. Within 90 days of completing construction and planting of the designated portion of the Remy site for the SE Grace Avenue Improvement project, the Applicant shall submit to Ecology (per Condition A.2) one hard copy and one electronic copy of the final as-built report, including maps. The as-built report must:
 - a. Document site conditions at Year Zero;
 - b. Include the information listed in attachment B (Information Required for As-Built Reports);
 - c. Include documentation of the recorded legal mechanism required in Condition E.7, below.
7. Within 90 days of completing construction and planting of the designated portion of the Remy Consolidated Mitigation Site, the Applicant shall record a restrictive covenant, a copy of this Order, and the site map from the final Wetland Mitigation Plan or as-built report indicating the location of the wetlands and their buffers. These documents must be recorded with the County Recording Office, Registrar of Deeds, or other official responsible for maintaining records for, or interest in, real property.

Monitoring and Maintenance:

8. The Applicant shall water and maintain all mitigation site plantings so as to meet the Mitigation Plan's performance standards.
9. The Applicant shall monitor the mitigation site for a minimum of 10 years. The Applicant shall use the monitoring methods described in pages 6-10 of the Mitigation Plan Addendum. Year-one monitoring shall begin at least one year after completion of the mitigation site, including planting.
10. The Applicant shall submit to Ecology (per Condition A.2) one hard and one electronic copy of monitoring reports documenting mitigation site conditions for years 1, 2, 3, 5, 7 and 10. At a minimum, the reports must contain the information in Attachment C (Information Required for Monitoring Reports). The Applicant shall submit the first monitoring report by December 31 of the year in which monitoring is conducted.
11. The Applicant shall implement the Mitigation Plan Addendum's contingency measures if the goals, objectives, or performance standards of the Mitigation Plan and Mitigation Plan Addendum are not being met.
12. Prior to implementing any contingency measures not specified in the Mitigation Plan or Mitigation Plan Addendum, the Applicant shall consult with, and obtain written approval from, Ecology for the changes.
13. When necessary to meet the performance standards, the Applicant shall replace dead or dying plants with the same species, or an appropriate native plant alternative, during the first available planting season and note species, numbers, and approximate locations of all replacement plants in the subsequent monitoring report.
14. For monitoring years five (5) and ten (10) the Applicant shall use the most current approved federal wetland delineation manual and appropriate regional supplement to delineate all compensatory wetlands and include delineation information (e.g., data sheets, maps, etc.) in the monitoring reports.
15. At the end of the monitoring period, the Applicant shall use the August 2004 or updated version of "Washington State Wetlands Rating System for Western Washington" to rate all wetlands and include the information in the monitoring report.
16. If the Applicant has not met all conditions and performance standards for the mitigation site at the end of the monitoring period, Ecology may require additional monitoring, additional mitigation, or both.
17. Until the Applicant has received written notice from Ecology that the Mitigation Plan and the Mitigation Plan Addendum have been fully implemented, the Applicant's obligation under Condition E.1 to mitigate for wetland impacts is not met.

F. Emergency/Contingency Measures:

1. The Applicant shall develop and implement a Spill Prevention and Containment Plan for all aspects of this project.
2. The Applicant shall have adequate and appropriate spill response materials on hand to respond to emergency release of petroleum products or any other material into waters of the state.
3. Fuel hoses, oil drums, oil or fuel transfer valves and fittings, etc. shall be checked regularly for drips or leaks, and shall be maintained and stored properly to prevent spills into waters of the state.
4. Any work that is out of compliance with the provisions of this Order, or conditions causing distressed or dying fish, or any discharge of oil, fuel, or chemicals into state waters, including wetlands, or onto land with a potential for entry into state waters, is prohibited. If these occur, the Applicant or operator shall immediately take the following actions:
 - a. Cease operations that are causing the compliance problem.
 - b. Assess the cause of the water quality problem and take appropriate measures to correct the problem and/or prevent further environmental damage.
 - c. In the event of finding distressed or dying fish, the applicant shall collect fish specimens and water samples in the affected area within the first hour of the event. These samples shall be held in refrigeration or on ice until the applicant is instructed by Ecology on what to do with them. Ecology may require analyses of these samples before allowing the work to resume.
 - d. In the event of a discharge of oil, fuel, or chemicals into state waters, or onto land with a potential for entry into state waters, containment and cleanup efforts shall begin immediately and be completed as soon as possible, taking precedence over normal work. Cleanup shall include proper disposal of any spilled material and used cleanup materials.
 - e. Notify Ecology of the failure to comply. All oil spills shall be reported immediately to Ecology's 24-Hour Spill Response Team at 1-800-258-5990, **and** within 24 hours of spills or other events to Ecology's Southwest Federal Project Coordinator at (360) 407-6926 or (360) 407-6300.
 - f. Submit a detailed written report to Ecology's Federal Permit Manager within five (5) days that describes the nature of the event, corrective action taken and/or planned, steps to be taken to prevent a recurrence, results of any samples taken, and any other pertinent information.

Compliance with this condition does not relieve the Applicant from responsibility to maintain continuous compliance with the terms and conditions of this Order or the resulting liability from failure to comply.

YOUR RIGHT TO APPEAL

You have a right to appeal this Order to the Pollution Control Hearing Board (PCHB) within 30 days of the date of receipt of this Order. The appeal process is governed by Chapter 43.21B RCW and Chapter 371-08 WAC. "Date of receipt" is defined in RCW 43.21B.001(2).

To appeal you must do the following within 30 days of the date of receipt of this Order:

- File your appeal and a copy of this Order with the PCHB (see addresses below). Filing means actual receipt by the PCHB during regular business hours.
- Serve a copy of your appeal and this Order on Ecology in paper form - by mail or in person. (See addresses below.) E-mail is not accepted.

You must also comply with other applicable requirements in Chapter 43.21B RCW and Chapter 371-08 WAC.

ADDRESS AND LOCATION INFORMATION

Street Addresses	Mailing Addresses
Department of Ecology Attn: Appeals Processing Desk 300 Desmond Drive SE Lacey, WA 98503	Department of Ecology Attn: Appeals Processing Desk PO Box 47608 Olympia, WA 98504-7608
Pollution Control Hearings Board 1111 Israel Rd SW STE 301 Tumwater, WA 98501	Pollution Control Hearings Board PO Box 40903 Olympia, WA 98504-0903

CONTACT INFORMATION

Please direct all questions about this Order to:

Lori Ochoa
Department of Ecology
Southwest Regional Office
P.O. Box 47775
Olympia, WA 98504-7775
loch461@ecy.wa.gov

MORE INFORMATION

Pollution Control Hearings Board Website

www.cho.wa.gov/Boards_PCHB.aspx

Chapter 43.21B RCW - Environmental Hearings Office – Pollution Control Hearings Board

<http://apps.leg.wa.gov/RCW/default.aspx?cite=43.21B>

Chapter 90.48 RCW – Water Pollution Control

<http://apps.leg.wa.gov/RCW/default.aspx?cite=90.48>

Chapter 173.204 WAC – Sediment Management Standards

www.ecy.wa.gov/biblio/wac173204.html

Chapter 173-200 WAC – Water Quality Standards for Ground Waters of the State of Washington

www.ecy.wa.gov/biblio/wac173200.html

Chapter 173-201A WAC – Water Quality Standards for Surface Waters of the State of Washington

www.ecy.wa.gov/biblio/wac173201A.html

SIGNATURE



Perry J Lund, Unit Manager
Shorelands and Environmental Assistance Program
Southwest Regional Office
Department of Ecology

4.17.12
Date

Attachment A
Statement of Understanding
Water Quality Certification Conditions
(See Condition A. 9)

City of Battle Ground
SE Grace Avenue Improvement Project
Water Quality Certification Order # **9026**
And
Corps Reference # **NWS-2011-165**

I, _____, state that I will be involved as an agent or contractor for The City of Battle Ground in the site preparation and/or construction of the SE Grace Avenue Improvement project located within the City of Battle Ground, Clark County, Washington. I further state that I have read and understand the relevant conditions of the Washington Department of Ecology Water Quality Certification Order #**9026** and the applicable permits and approvals referenced therein which pertain to the project-related work for which I am responsible.

Signature

Date

Title

Phone

Company

Attachment B
Information Required for As-built Reports
(See Condition E.6.b)

SE Grace Avenue Improvement Project
Water Quality Certification Order # **9026**
And
Corps Reference # **NWS-2011-165**

Background Information

- 1) Project name.
- 2) Ecology docket number and the Corps reference number.
- 3) Name and contact information for the parties responsible for the mitigation site including:
 - a) The applicant.
 - b) The landowner.
 - c) Wetland professional on site during construction of the compensatory mitigation site.
- 4) Name and contact information for the party responsible for preparing the report.
- 5) Who the report was prepared for (name, address, and phone number) *{if different from number 3 above.}*
- 6) Month and year the report was produced.

The Development (Impact) Site

- 7) Brief description of the development project (impact site). Include:
 - a) Directions to the site.
 - b) Month and year construction of the development project started and ended.
 - c) Area (acres) and type(s) (rating category, HGM classification, and Cowardin classification) of wetlands that were **actually** impacted by the development project, including temporary impacts.

The Compensatory Mitigation Project

- 8) Brief description of the **final** compensatory mitigation project with any changes from the approved plan made during construction. Include:
 - a) Directions to the site.
 - b) Who completed the compensatory mitigation project (name, address, and phone number).
 - c) **Actual** acreage and type(s) (re-establishment, rehabilitation, creation, enhancement, and preservation) of mitigation authorized to compensate for wetland impacts.
 - d) Important dates including:
 - i. Month and year the wetland impacts occurred.
 - ii. When work on the compensatory mitigation site began and ended.
 - iii. When different activities began and ended such as grading, removal of invasive plants, installing plants, and installing habitat features.
- 9) Description of any problems encountered and solutions implemented (with reasons for changes) during construction of the compensatory mitigation site.

- 10) Any changes to the goals, objectives, and performance standards of the compensatory mitigation project.
- 11) List of any follow-up actions needed, with a schedule.
- 12) Final site maps (8-1/2" x 11" or larger) of the compensatory mitigation site(s) including the following (at a minimum).
 - a) Geographic location of the site with landmarks;
 - b) Clear delineation of the project perimeter(s);
 - c) Topography (with a description of how elevations were determined);
 - d) Installed planting scheme (quantities, densities, sizes, and approximate locations of plants, as well as the source(s) of plant material);
 - e) Location of habitat features;
 - f) Location of permanent photo stations.

The final site maps should reflect on-the-ground conditions after the site work is completed. Include the month and year when the maps were produced and, if applicable, when information was collected.

- 13) Photographs of the site at as-built conditions taken from permanent photo stations. We recommend photo pans.
- 14) Copies of any records of deed notifications or conservation easements.

Attachment C
Information Required for Monitoring Reports
(See Condition E.10)

SE Grace Avenue Improvement Project
Water Quality Certification Order # 9026
And
Corps Reference # NWS-2011-165

Ecology requires the following information for monitoring reports submitted under this Order. Ecology will accept additional information that may be required by other regulators.

Background Information

- 1) Project name.
- 2) Ecology docket number and Corps reference number.
- 3) Name and contact information of the parties responsible for the mitigation site, including:
 - a) The applicant.
 - b) The landowner.
- 4) Name and contact information for the party responsible for the monitoring activities and report.
- 5) Whom the report was prepared for (name, address, and phone number) *{if different from number 3 above}*.
- 6) Month and year the monitoring data were collected.
- 7) Month and year the report was produced.

Mitigation Project Information

- 8) Brief description of the mitigation project, including:
 - a) Directions to the site.
 - b) Acreage and type(s) (re-establishment, rehabilitation, creation, enhancement, and preservation) of mitigation authorized to compensate for wetland impacts.
- 9) Brief description of monitoring approach and methods.
- 10) A list of the goals and objectives for the mitigation project.
- 11) Summary table of monitoring data compared with performance standards. Using the monitoring data, describe how the site is developing toward goals and objectives and whether the project is in compliance with performance standards.
- 12) Summary (including dates) of management actions (maintenance, contingencies, and corrective actions) implemented at the site(s).
- 13) Summary of any difficulties or significant events that occurred on the site that may affect the ultimate success of the project.
- 14) Specific recommendations for any additional corrective actions or adaptive management with a time table.
- 15) Summary of any lessons learned.
- 16) Site maps (8-1/2" x 11" or larger) of the compensatory mitigation site(s) including the following (at a minimum):

- a) Include the month and year when the maps were produced and when information was collected.
 - b) The geographic location of the site with landmarks.
 - c) Clear delineation of the project perimeter(s).
 - d) Species, numbers, and approximate locations of all replanted vegetation.
 - e) Location of habitat features.
 - f) Location of permanent photo stations and location of any other photos.
 - g) Location of sampling locations such as points, lines, or transects.
- 17) Photographs taken at permanent photo stations (and other photographs as needed) from the most recent monitoring visit, which are dated and clearly indicate the direction from which the photo was taken. We recommend photo pans.